



**EPSTEIN DRANGEL LLP**

60 East 42nd Street, Suite 1250, New York, NY  
T: 212.292.5390 • E: mail@ipcounselors.com  
www.ipcounselors.com

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/29/2023

August 28, 2023

**VIA ECF**

Hon. Analisa Torres  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Moonbug Entertainment Ltd., et al. v. 640350 Store, et al.***  
**Case No. 22-cv-5042 (AT)**  
**Third Request For Extension of Time to Respond to June 6, 2023 Order**

Dear Judge Torres,

We represent Plaintiffs Moonbug Entertainment Limited and Treasure Studio Inc. (“Plaintiffs”), in the above-referenced matter (the “Action”).<sup>1</sup> On June 6, 2023, the Court entered an Order, *inter alia*, directing Plaintiffs to provide additional information supporting personal jurisdiction as to each Defendant (“June 6, 2023 Order”). (Dkt. 48). For the reasons detailed below, Plaintiffs respectfully request a third and final extension of time to respond to the Court’s June 6, 2023 Order. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs respectfully submit the following:

1. **Original Deadline:** September 1, 2023
2. **The number of previous requests for adjournment:** Two, this is Plaintiffs’ third request for an extension of time to respond to the June 6, 2023 Order.
3. **The reason for the current request:** As indicated in Plaintiffs’ second request for an extension of time to respond to the June 6, 2023 Order (Dkt. 51), the only means by which Plaintiffs can obtain data evidencing Defaulting Defendants’ sales of Counterfeit Products to consumers in New York to support Plaintiffs’ claim for personal jurisdiction is if AliExpress produces the same in compliance with the expedited discovery ordered in the Temporary Restraining Order (“TRO”). Plaintiffs have been corresponding with AliExpress’ local counsel who has repeatedly indicated AliExpress’ willingness to cooperate with Plaintiffs’ request. However, for the first time today, August 28, 2023, AliExpress’ local counsel made an express representation that it will provide Plaintiffs with the exact information requested, but that it would need “until mid-September (approximately two more weeks) to complete the data gathering and disclosure process to do so.” If AliExpress does not provide Plaintiffs with the requested information by mid-September,

---

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Complaint or Application.

Hon. Analisa Torres

August 28, 2023

Page 2

Plaintiffs will not ask for any further adjournments or extensions of time and will file a motion to compel by no later than September 29, 2023.

4. **Whether the adversary consents:** All of the Defendants remaining in this Action are currently in default, thus Plaintiffs did not seek their consent.
5. **Proposed alternative dates:** To the extent Plaintiffs receive the full expedited discovery from AliExpress, Plaintiffs respectfully propose filing their response to the June 6, 2023 Order by September 29, 2023. To the extent that AliExpress does not provide the expedited discovery as represented, Plaintiffs respectfully propose to file a motion to compel by September 29, 2023.

Plaintiffs' counsel sincerely apologizes to the Court for the inconvenience caused by this delay and thanks the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

BY: /s/ Danielle S. Futterman  
Danielle S. Futterman (DY 4228)  
dfutterman@ipcounselors.com

60 East 42nd Street, Suite 1250

New York, NY 10165

Telephone: (212) 292-5390

Facsimile: (212) 292-5391

*Attorneys for Plaintiffs*

*Moonbug Entertainment Limited and Treasure  
Studio Inc.*

GRANTED.

SO ORDERED.

Dated: August 29, 2023  
New York, New York



---

**ANALISA TORRES**  
**United States District Judge**